

BLANKROME

1271 Avenue of the Americas | New York, NY 10020
blankrome.com

Phone: (212) 885-5148
Fax: (917) 591-7897
Email: deborah.skakel@blankrome.com

March 28, 2023

VIA ECF

The Honorable John G. Koeltl
United States District Judge
United States District Court – S.D.N.Y.
500 Pearl Street
New York, New York 10007

**Re: City of Almaty, Kazakhstan, et ano. v. Mukhtar Ablyazov, et al.,
No. 1:15-cv-05345 (JGK) (KHP)**

Dear Judge Koeltl:

We represent Triadou SPV S.A. (“Triadou”) in the above-referenced case and write to respectfully request an extension of time for Triadou to respond to BTA Bank JSC’s (“BTA”) proposed findings of fact and conclusions of law, as well as BTA’s proposed judgment. (ECF 1717). Specifically, Triadou asks the Court to extend by 30 days the time to file its responses, from April 4, 2023 to May 4, 2023, and to afford BTA a similar extension to file its reply from May 5, 2023 to June 2, 2023. Counsel for Triadou has conferred with BTA’s counsel regarding the requested extension, which BTA does not object to Triadou’s request. This is Triadou’s first request for an extension of the briefing schedule for proposed findings of fact and conclusions of law.

Good cause exists to modify the briefing schedule because of the scope of BTA’s submission, which is close to 70 pages and spans more than 250 proposed findings and conclusions, and the breadth of the trial record in this matter. The volume of material requires additional time to review and organize address. In addition, counsel for Triadou has had other pressing obligations arise on other matters that contribute to its need for this limited extension.

Thank you for your consideration.

Respectfully submitted,

/s/ Deborah A. Skakel
Deborah A. Skakel